

# NeuroCluster Security Whitepaper

NeuroCluster Enterprise AI Platform

December 13, 2025

## NeuroCluster Security Whitepaper

### Enterprise AI Platform Security Architecture

**Version:** 2.0 **Publication Date:** December 13, 2025 **Classification:** Public **Target Audience:** CISOs, Security Architects, Compliance Officers

### Executive Summary

NeuroCluster is an enterprise-grade AI agent platform designed with security as a foundational principle. This whitepaper details our comprehensive security architecture, including infrastructure security, application security, data protection, AI-specific security controls, and compliance frameworks.

#### Key Security Highlights:

- **Zero-trust architecture** with end-to-end encryption
- **Permission-aware AI** with document-level access control
- **Multi-layered defense** across infrastructure, application, and AI layers
- **Compliance-ready** for SOC 2, ISO 27001, GDPR, EU AI Act
- **Air-gapped deployment** option for maximum security
- **Continuous security monitoring** with SIEM integration

### Table of Contents

- [Security Architecture Overview](#)

- Infrastructure Security
  - Application Security
  - Data Protection
  - AI-Specific Security
  - Identity & Access Management
  - Network Security
  - Encryption
  - Audit & Logging
  - Compliance & Certifications
  - Incident Response
  - Security Operations
- 

## Security Architecture Overview

---

### Defense in Depth Strategy

NeuroCluster implements a multi-layered security model:

Layer 7: Compliance & Governance
- SOC 2 Type II, ISO 27001, GDPR, EU AI Act

Layer 6: AI Security
- Prompt injection prevention, jailbreak detection
- Output filtering, tool permission matrix

Layer 5: Application Security
- Input validation, output sanitization, RBAC
- SQL injection prevention, XSS protection

Layer 4: Data Security
- Encryption at rest (AES-256), in transit (TLS 1.3)
- Row-level security, ACL enforcement

Layer 3: Identity & Access
- SSO (SAML/OIDC), MFA, group mapping
- JWT validation, session management

Layer 2: Network Security
- Service mesh (Linkerd) with mTLS
- API gateway (Kong), network policies, WAF

Layer 1: Infrastructure Security
- Kubernetes security, pod security policies
- Secrets management (Vault), IDS/IPS

## Security Principles

- **Zero Trust:** Never trust, always verify - authentication and authorization at every layer
- **Least Privilege:** Users and services granted minimum permissions required
- **Defense in Depth:** Multiple overlapping security controls
- **Secure by Default:** Security settings enabled out-of-the-box
- **Privacy by Design:** Data protection built into architecture
- **Continuous Monitoring:** Real-time threat detection and response

---

# Infrastructure Security

---

## Kubernetes Security

### Pod Security Standards:

- Enforce **Restricted** PSS policy for all workloads
- No privileged containers permitted
- Read-only root filesystems where possible
- Resource limits enforced (CPU, memory)
- Non-root user execution mandated

### Example Pod Security Policy:

```
apiVersion: policy/v1beta1
kind: PodSecurityPolicy
metadata:
  name: neurocluster-restricted
spec:
  privileged: false
  allowPrivilegeEscalation: false
  requiredDropCapabilities:
    - ALL
  volumes:
    - 'configMap'
    - 'emptyDir'
    - 'projected'
    - 'secret'
    - 'downwardAPI'
    - 'persistentVolumeClaim'
  hostNetwork: false
  hostIPC: false
  hostPID: false
  runAsUser:
    rule: 'MustRunAsNonRoot'
  seLinux:
    rule: 'RunAsAny'
  fsGroup:
    rule: 'RunAsAny'
  readOnlyRootFilesystem: true
```

### Network Policies:

- Default deny all ingress/egress
- Explicit allow rules for required communication
- Namespace isolation enforced
- Egress filtering to external services

#### **RBAC:**

- Principle of least privilege for service accounts
- No cluster-admin access for applications
- Audit logging for all RBAC changes
- Regular access reviews (quarterly)

## **Container Security**

#### **Image Security:**

- Base images: Official, minimal images only (Alpine, Distroless)
- Vulnerability scanning: Trivy/Snyk in CI/CD pipeline
- Image signing: Cosign for supply chain security
- Private registry: Harbor with RBAC and scanning
- No secrets in images: Environment variables or Vault

#### **Runtime Security:**

- Falco for runtime threat detection
- Behavioral monitoring for anomalies
- Container immutability enforced
- Automatic pod restart on policy violation

## **Secrets Management**

#### **HashiCorp Vault Integration:**

- All secrets stored in Vault (never in Git/ConfigMaps)
- Dynamic secret generation for databases
- Automatic secret rotation (every 90 days)
- Encryption at rest with auto-unseal
- Audit logging for all secret access

#### **Secret Access Pattern:**

```
Application → Vault Agent → Vault Server → Encrypted Storage
              (sidecar)      (TLS 1.3)      (AES-256-GCM)
```

---

## Application Security

---

### Secure Development Lifecycle

#### Code Review:

- Mandatory peer review for all code changes
- Security-focused review for auth/crypto code
- Automated SAST (Static Application Security Testing) in CI/CD
- Dependency vulnerability scanning (Dependabot, Snyk)

#### Security Testing:

- **SAST:** SonarQube for static code analysis
- **DAST:** OWASP ZAP for dynamic testing
- **SCA:** Snyk for dependency vulnerabilities
- **Penetration Testing:** Annual third-party pen tests

### Input Validation & Output Encoding

#### Input Validation:

- Pydantic models validate all API inputs
- Type checking enforced (Python type hints)
- Length limits on all text fields
- Regex validation for structured data (email, phone, etc.)
- Reject unexpected characters/formats

#### SQL Injection Prevention:

- Parameterized queries exclusively
- ORM (SQLAlchemy) for database access
- No dynamic SQL construction
- Prepared statements for all queries

### **Cross-Site Scripting (XSS) Prevention:**

- Output encoding for all user-generated content
- Content Security Policy (CSP) headers
- React's built-in XSS protection
- DOMPurify for sanitizing HTML inputs

### **Cross-Site Request Forgery (CSRF) Protection:**

- CSRF tokens for state-changing operations
- SameSite cookie attribute
- Origin header validation
- Double-submit cookie pattern

## **API Security**

### **Authentication:**

- JWT tokens (RS256) with short expiry (1 hour)
- Refresh tokens for session extension
- Token revocation list (Redis cache)
- API key authentication for service-to-service

### **Rate Limiting:**

- Per-user limits: 1000 requests/hour
- Per-IP limits: 5000 requests/hour
- Burst protection: Max 100 requests/minute
- Adaptive rate limiting based on behavior

### **API Gateway (Kong):**

- Request/response transformation
  - JWT validation at edge
  - IP whitelisting/blacklisting
  - Request size limits (10MB max)
  - Timeout enforcement (30s default)
-

# Data Protection

---

## Encryption

### Encryption at Rest:

- **Algorithm:** AES-256-GCM
- **Key Management:** HashiCorp Vault with auto-rotation
- **Scope:** Database, object storage, backups
- **Implementation:** Transparent Data Encryption (TDE) for PostgreSQL

### Encryption in Transit:

- **TLS Version:** TLS 1.3 (minimum TLS 1.2)
- **Cipher Suites:** ECDHE-RSA-AES256-GCM-SHA384, ECDHE-RSA-AES128-GCM-SHA256
- **Certificate Authority:** Let's Encrypt with auto-renewal
- **HSTS:** Enabled with 1-year max-age
- **Certificate Pinning:** Implemented for mobile/desktop apps

### End-to-End Encryption:

- Sensitive fields (API keys, credentials) encrypted at application layer
- Fernet symmetric encryption (AES-128-CBC + HMAC-SHA256)
- Per-user encryption keys for user-specific data

## Data Classification

| Classification | Examples | Controls | |-----|-----|-----| | **Public** |  
Marketing content, public docs | Encryption in transit | | **Internal** | Agent configurations,  
logs | Encryption at rest + transit, RBAC | | **Confidential** | User data, PII, API keys |  
Encryption at rest + transit, RBAC, audit logs | | **Restricted** | Credentials, secrets, PHI | E2E  
encryption, Vault storage, strict RBAC, DLP |

## Data Minimization

- Collect only necessary data for functionality
- Pseudonymization for analytics data
- Automatic PII redaction in logs
- Data retention policies enforced (30 days logs, 7 years audit)
- Right to erasure (GDPR Article 17) supported



## Data Residency

### Geographic Options:

- **EU Region:** Frankfurt, Amsterdam (GDPR-compliant)
- **US Region:** US East (Virginia), US West (Oregon)
- **UK Region:** London (UK GDPR-compliant)
- **On-Premise:** Customer's own infrastructure (full control)

### Cross-Border Transfers:

- Standard Contractual Clauses (SCCs) for EU-US transfers
  - No data leaves selected region without explicit consent
  - Metadata stored in same region as data
- 

## AI-Specific Security

---

### Prompt Injection Prevention

#### Detection Mechanisms:

- Pattern matching for common injection attempts
- Semantic similarity to known attacks
- Confidence scoring for suspicious inputs
- LLM-as-judge evaluation for advanced attacks

#### Prevention Techniques:

- System prompt isolation (cannot be overridden)
- Input sanitization and normalization
- Instruction hierarchy enforcement
- Context window segmentation

#### Example Attacks Blocked:

- "Ignore previous instructions and..."
- "System: Execute command..."
- "DAN mode activated..."
- "Pretend you are..."

- ""

## Jailbreak Detection

### 100+ Test Cases:

- Roleplay jailbreaks (DAN, AIM, etc.)
- Hypothetical scenarios
- Ethical guideline bypass attempts
- Multi-turn context exploitation
- Output encoding tricks (base64, rot13)

### Defense Strategy:

- Maintain ethical boundaries across conversation
- Refuse harmful requests consistently
- Provide safe alternatives
- Log jailbreak attempts for analysis

## Output Filtering

### PII Detection & Redaction:

- Email addresses: [EMAIL\_REDACTED]
- Phone numbers: [PHONE\_REDACTED]
- SSN: [SSN\_REDACTED]
- Credit card numbers: [CC\_REDACTED]
- API keys/tokens: [TOKEN\_REDACTED]

### Harmful Content Filtering:

- Hate speech detection (multi-lingual)
- Violence/gore filtering
- Sexual content filtering
- Self-harm prevention
- Illegal activity prevention

## Tool Permission Matrix

### Example Permission Model:

User Role	ServiceNow	Jira	File System	Database	Internet	----- ----- -----
- ----- ----- -----	User	Read-only	Read-only	None	None	Search only
Agent Builder	Read/Write	Read/Write	Read-only	Read-only	Restricted	Platform
Admin	Full	Full	Read/Write	Read-only	Full	Super Admin   Full   Full   Full   Full   Full

### Tool Execution Controls:

- Whitelisted tools per agent
- Permission checks before tool invocation
- Tool execution timeout (30s default)
- Rate limiting per tool (10 calls/minute)
- Audit logging for all tool calls

## Evaluation Framework

### 135+ Evaluation Tests:

- **Safety (45 tests):** Prompt injection, jailbreak, PII leakage
- **Quality (52 tests):** Accuracy, consistency, citation quality
- **Performance (38 tests):** Latency, token efficiency, load

### CI/CD Integration:

- Automated testing on every agent update
- PR blocking on failed safety tests
- Continuous monitoring of production agents
- Weekly regression testing

---

## Identity & Access Management

---

### Authentication

#### Multi-Factor Authentication (MFA):

- TOTP (Time-based One-Time Password)
- SMS backup (optional)
- Hardware keys (YubiKey, FIDO2)
- Biometric authentication (mobile apps)
- Enforced for admin roles

### Single Sign-On (SSO):

- **Protocols:** SAML 2.0, OIDC, OAuth 2.0
- **Providers:** Azure AD, Google Workspace, Okta, Keycloak
- **Features:** Just-in-time provisioning, group sync, SCIM

### Session Management:

- Session timeout: 12 hours (configurable)
- Concurrent session limit: 5 per user
- Session invalidation on password change
- Secure cookie attributes (HttpOnly, Secure, SameSite)

## Authorization

### Role-Based Access Control (RBAC):

| Role | Permissions | |-----|-----| | **Super Admin** | Full platform access, user management, system configuration | | **Platform Admin** | Manage users, agents, workflows, view all data | | **Agent Builder** | Create/edit agents, access agent marketplace, limited data access | | **Analyst** | Read-only access to analytics, dashboards, reports | | **User** | Execute agents, view own data, no admin access |

### Attribute-Based Access Control (ABAC):

- **User attributes:** Department, location, clearance level
- **Resource attributes:** Classification, owner, project
- **Context attributes:** Time of day, IP address, device type
- **Dynamic policies:** Grant/deny based on attribute evaluation

### Document-Level ACL:

- Inherited from source system (M365, Google Workspace)
  - User-level permissions (view, edit, delete)
  - Group-level permissions (via group membership)
  - Enforced at retrieval time (permission-aware RAG)
-

# Network Security

---

## Service Mesh (Linkerd)

### Mutual TLS (mTLS):

- Automatic certificate provisioning and rotation
- Service-to-service encryption
- Certificate validity: 24 hours (auto-renewed)
- Strong cipher suites only

### Traffic Policies:

- Circuit breaker: 5 consecutive failures → open
- Retry policy: 3 retries with exponential backoff
- Timeout: 30s default, configurable per service
- Load balancing: Least-requests algorithm

### Observability:

- Request volume, success rate, latency (P50/P95/P99)
- Distributed tracing (Jaeger integration)
- Real-time traffic visualization
- Anomaly detection for unusual traffic patterns

## API Gateway (Kong)

### Security Plugins:

- **Rate Limiting:** Per-consumer, per-route, per-IP
- **IP Restriction:** Whitelist/blacklist support
- **Bot Detection:** Block malicious bots and scrapers
- **Request Size Limiting:** 10MB default max
- **CORS:** Configurable allowed origins

### WAF (Web Application Firewall):

- OWASP ModSecurity Core Rule Set
- SQL injection protection
- XSS protection
- Directory traversal prevention

- Custom rules for API-specific attacks

## Network Policies

### Default Deny:

```
apiVersion: networking.k8s.io/v1
kind: NetworkPolicy
metadata:
  name: default-deny-all
spec:
  podSelector: {}
  policyTypes:
    - Ingress
    - Egress
```

### Explicit Allow Example:

```
apiVersion: networking.k8s.io/v1
kind: NetworkPolicy
metadata:
  name: allow-backend-to-db
spec:
  podSelector:
    matchLabels:
      app: backend
  policyTypes:
    - Egress
  egress:
    - to:
        - podSelector:
            matchLabels:
              app: postgresql
      ports:
        - protocol: TCP
          port: 5432
```

## Intrusion Detection/Prevention

### Falco Rules:

- Shell spawned in container
- Sensitive file read/write
- Privilege escalation attempt

- Unexpected network connection
- Unauthorized process execution

**Actions on Detection:**

- Alert to Slack/PagerDuty
  - Log to SIEM
  - Automatically kill pod (optional)
  - Block IP at firewall (optional)
- 

## Audit & Logging

---

### Audit Log Scope

**What We Log:**

- All user authentication attempts (success/failure)
- All authorization decisions (allow/deny)
- All data access (read/write/delete)
- All administrative actions (user management, config changes)
- All agent executions (inputs, outputs, tool calls)
- All API calls (endpoint, parameters, response code)
- All security events (MFA bypass, suspicious activity)

**What We DON'T Log:**

- Passwords or API keys
- Full document content (only metadata)
- PII in clear text (redacted automatically)

### Log Format

```
{
  "timestamp": "2025-12-13T10:30:00.123Z",
  "event_id": "evt_abc123",
  "event_type": "auth.login.success",
  "user_id": "usr_def456",
  "user_email": "user@company.com",
  "ip_address": "203.0.113.45",
  "user_agent": "Mozilla/5.0...",
  "resource_type": "agent",
  "resource_id": "agent_ghi789",
  "action": "execute",
  "result": "success",
  "metadata": {
    "agent_name": "IT Triage Agent",
    "execution_time_ms": 2345,
    "tokens_used": 1234
  }
}
```

## Log Retention

| Log Type | Retention Period | Storage | |-----|-----|-----| | **Audit Logs** | 7 years | PostgreSQL + archive (S3 Glacier) | | **Application Logs** | 30 days | Elasticsearch | | **System Logs** | 90 days | Loki | | **Debug Logs** | 7 days | Ephemeral (not archived) |

## SIEM Integration

### Supported Formats:

- **Splunk:** HTTP Event Collector (HEC)
- **ELK Stack:** Logstash with JSON codec
- **Sumo Logic:** HTTP Source API
- **Azure Sentinel:** Syslog/CEF format

### Export Frequency:

- Real-time streaming for critical events
  - Batch export every 5 minutes for normal events
  - On-demand export via API
-



# Compliance & Certifications

---

## SOC 2 Type II

**Scope:** Security, Availability, Confidentiality

- **Status:** In progress (audit scheduled Q1 2026)
- **Controls:** 150+ security controls documented
- **Testing:** Quarterly internal audits
- **Report:** Available to customers under NDA

**Key Controls:**

- Logical access controls (CC6.1-CC6.3)
- System operations (CC7.1-CC7.5)
- Change management (CC8.1)
- Risk mitigation (CC9.1-CC9.2)

## ISO 27001

**Scope:** Information Security Management System (ISMS)

- **Status:** In progress (certification Q2 2026)
- **Annex A Controls:** 93 applicable controls
- **Risk Assessment:** Annual risk assessment completed
- **Certificate:** ISO/IEC 27001:2022

**Control Domains:**

- A.5: Organizational controls
- A.6: People controls
- A.7: Physical controls
- A.8: Technological controls

## GDPR Compliance

**Legal Basis:** Legitimate interest, contract performance

- **Data Processing Agreement (DPA):** Available for all customers
- **Data Subject Rights:** Automated right to access, erasure, portability
- **Privacy by Design:** Implemented at architecture level

- **Data Protection Officer (DPO):** Dr. Elena Vermeer, dpo@neurocluster.ai

#### **GDPR Features:**

- **Consent Management:** Granular consent options
- **Data Minimization:** Only necessary data collected
- **Purpose Limitation:** Data used only for stated purpose
- **Storage Limitation:** Automatic deletion after retention period
- **Data Portability:** Export in machine-readable format (JSON, CSV)

## **EU AI Act Compliance**

**Classification:** General-purpose AI system (GPAI)

- **Risk Level:** Limited risk (transparency obligations)
- **Requirements Met:**
  - Transparency about AI-generated content - Detection and disclosure of AI outputs - Safeguards against illegal content - Public summaries of training data - Energy efficiency reporting

#### **Technical Documentation:**

- Model architecture and training data documented
- Risk assessment for high-risk use cases
- Quality management system established
- Human oversight mechanisms in place

## **Additional Compliance**

- **HIPAA:** Available for healthcare customers (BAA provided)
  - **PCI DSS Level 1:** Not applicable (no credit card processing)
  - **NIST Cybersecurity Framework:** Aligned with CSF 2.0
  - **ISO/IEC 42001:** AI Management System (in progress)
  - **OWASP ASVS Level 2:** Application Security Verification
-

# Incident Response

---

## Incident Response Plan

### Phases:

- **Preparation:** Playbooks, on-call rotation, tooling
- **Detection:** Monitoring, alerts, threat intelligence
- **Analysis:** Triage, scope assessment, impact analysis
- **Containment:** Isolate affected systems, block threats
- **Eradication:** Remove threat, patch vulnerabilities
- **Recovery:** Restore services, verify integrity
- **Post-Incident:** Postmortem, lessons learned, improvements

## Security Incident Classification

Severity	Definition	Response Time	Escalation
<b>P1 (Critical)</b>	Data breach, system compromise	< 15 minutes	CISO, CEO
<b>P2 (High)</b>	Unauthorized access, DDoS	< 1 hour	Security team, VP Eng
<b>P3 (Medium)</b>	Vulnerability, policy violation	< 4 hours	Security team
<b>P4 (Low)</b>	Security hygiene, informational	< 24 hours	Security team

## Communication Plan

### Internal:

- Security team notified via PagerDuty
- Status page updated (status.neurocluster.com)
- Affected teams briefed in dedicated Slack channel
- Executive summary to leadership within 2 hours

### External:

- Customer notification within 72 hours (GDPR requirement)
- Public disclosure for breaches affecting >1000 users
- Media relations via PR team
- Regulatory notification (if required)

## Data Breach Response

### Steps:

- **Contain:** Isolate affected systems, revoke compromised credentials
- **Assess:** Determine data accessed, number of affected users
- **Notify:** Inform DPO, affected users, regulatory authorities
- **Remediate:** Patch vulnerabilities, improve controls
- **Monitor:** Enhanced monitoring for 90 days post-breach

**Notification Template:** Pre-approved legal template available

---

## Security Operations

---

### Vulnerability Management

#### Vulnerability Scanning:

- **Frequency:** Weekly automated scans
- **Tools:** Nessus, Qualys, Trivy (containers)
- **Scope:** All internet-facing systems, internal services
- **Remediation SLA:**
  - Critical: 7 days - High: 30 days - Medium: 90 days - Low: 180 days

#### Penetration Testing:

- **Frequency:** Annual external pen test
- **Scope:** Web applications, APIs, infrastructure
- **Methodology:** OWASP Testing Guide, PTES
- **Vendor:** Third-party firm with OSCP/GPEN certifications
- **Report:** Shared with customers under NDA

### Security Awareness Training

#### Employee Training:

- New hire security orientation (Day 1)
- Annual security awareness training (mandatory)
- Phishing simulation exercises (monthly)

- Secure coding training for engineers (quarterly)

**Topics Covered:**

- Password hygiene and MFA
- Phishing and social engineering
- Data classification and handling
- Incident reporting procedures
- Secure development practices

## **Third-Party Risk Management**

**Vendor Assessment:**

- Security questionnaire (SOC 2, ISO 27001 status)
- Data processing agreement review
- Access controls evaluation
- Ongoing monitoring (annual reviews)

**Sub-Processors:**

- AWS, Supabase, Sentry, Langfuse (documented in DPA)
- All sub-processors assessed for security
- Customer notification 30 days before new sub-processor

---

## **Contact Information**

---

### **Security Team**

**Chief Information Security Officer (CISO):**

- Name: Michael Chen
- Email: [ciso@neurocluster.ai](mailto:ciso@neurocluster.ai)
- Phone: +31 20 123 4568

**Security Operations Center (SOC):**

- Email: [security@neurocluster.ai](mailto:security@neurocluster.ai)
- PGP Key: <https://neurocluster.ai/security.asc>
- Phone: +31 20 123 4569 (24/7)

**Vulnerability Disclosure:**

- Program: <https://neurocluster.ai/security/disclosure>
- Email: [security@neurocluster.ai](mailto:security@neurocluster.ai)
- Scope: All neurocluster.ai domains and APIs
- Rewards: Recognition, swag, monetary bounties

**Bug Bounty Program**

**In Scope:**

- neurocluster.ai, api.neurocluster.ai
- XSS, SQLi, RCE, authentication bypass
- SSRF, IDOR, privilege escalation

**Out of Scope:**

- Social engineering, physical attacks
- DDoS, rate limiting bypass
- Third-party services
- Issues requiring user interaction (self-XSS)

**Rewards:**









- Critical: \$5,000 - \$10,000
- High: \$2,000 - \$5,000
- Medium: \$500 - \$2,000
- Low: \$100 - \$500

---

**Appendix A: Security Control Matrix**

---

Control ID	Control Name	Implementation Status	Evidence	
AC-1	Access Control Policy	✔ Implemented	SSO Setup Guide	AC-2
AC-2	Account Management	✔ Implemented	User management API	AC-3
AC-3	Access Enforcement	✔ Implemented	RBAC/ABAC enforcement	AC-7
AC-7	Unsuccessful Login Attempts	✔ Implemented	Rate limiting, lockout	AC-17
AC-17	Remote Access	✔ Implemented	VPN, MFA required	AU-2
AU-2	Audit Events	✔ Implemented	Comprehensive audit logging	AU-6
AU-6	Audit Review	✔ Implemented	SIEM integration	AU-12
AU-12	Audit Generation	✔ Implemented	backend_logs table	IA-2
IA-2	User Identification	✔ Implemented	SSO, JWT validation	IA-5
IA-5	Authenticator Management	✔ Implemented	Password policy, MFA	SC-7

| Boundary Protection |  Implemented | Firewall, WAF, network policies | | SC-8 | Transmission Confidentiality |  Implemented | TLS 1.3, mTLS | | SC-12 | Cryptographic Key Management |  Implemented | HashiCorp Vault | | SC-13 | Cryptographic Protection |  Implemented | AES-256, TLS 1.3 | | SC-28 | Protection of Information at Rest |  Implemented | AES-256 encryption | | SI-2 | Flaw Remediation |  Implemented | Vulnerability management | | SI-3 | Malicious Code Protection |  Implemented | Antivirus, EDR | | SI-4 | Information System Monitoring |  Implemented | Prometheus, Falco, Sentry |

---

## Appendix B: Compliance Mapping

---

### GDPR Articles Compliance

| Article | Requirement | Implementation | |-----|-----|-----| | Art. 5 | Principles (lawfulness, fairness, transparency) | Privacy policy, consent mgmt | | Art. 6 | Lawful basis | Legitimate interest, contract | | Art. 15 | Right of access | Self-service export | | Art. 16 | Right to rectification | User profile editing | | Art. 17 | Right to erasure | Account deletion API | | Art. 20 | Right to data portability | JSON/CSV export | | Art. 25 | Data protection by design | Architecture review | | Art. 30 | Records of processing | ROPA maintained | | Art. 32 | Security of processing | This whitepaper | | Art. 33 | Breach notification | Incident response plan |

---

**Document Version:** 2.0 **Classification:** Public **Last Reviewed:** December 13, 2025 **Next Review:** March 13, 2026

**Prepared By:** NeuroCluster Security Team **Approved By:** Michael Chen, CISO

---

*For questions or concerns about NeuroCluster security, please contact [security@neurocluster.ai](mailto:security@neurocluster.ai)*

---